

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- v. -

DANIEL DANIEL,
a/k/a "Roma,"

Defendant.

- - - - - X

20 CRIM 101
INDICTMENT

20 Cr.

COUNT ONE

(Conspiracy to Commit Money Laundering)

The Grand Jury charges:

1. From at least in or about February 2017, up to and including in or about January 2019, in the Southern District of New York and elsewhere, DANIEL DANIEL, a/k/a "Roma," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit money laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

2. It was a part and an object of the conspiracy that DANIEL DANIEL, a/k/a "Roma," the defendant, and others known and unknown, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such a financial transaction, which in fact involved the

proceeds of specified unlawful activity, to wit, wire fraud, interstate transportation of stolen property, interstate sale and receipt of stolen property, trafficking in contraband tobacco, operation of an illegal gambling business, and fraud relating to identification documents, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATION

3. As a result of committing the offense alleged in Count One of this Indictment, DANIEL DANIEL, a/k/a "Roma," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

Substitute Asset Provision

4. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

a. Cannot be located upon the exercise of due

diligence;

b. Has been transferred or sold to, or deposited with,
a third person;

c. Has been placed beyond the jurisdiction of the
Court;

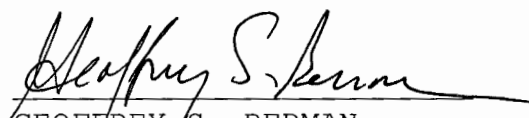
d. Has been substantially diminished in value; or

e. Has been commingled with other property which
cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United
States Code, Section 853(p) and Title 28, United States Code,
Section 2461(c), to seek forfeiture of any other property of the
defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

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(18 U.S.C. § 1956(h))

GEOFFREY S. BERMAN
United States Attorney.


Foreperson

2/4/2020 (BZ)
INDICTMENT FILED
ASSIGNED TO JUDGE LIMAN
HON. SARAH NETBURN, USMJ.